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Justifications and Limits in the Politically Motivated Lawbreaking of Environmental Activist Groups

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Abstract

In recent events, notions of political protest, civil disobedience, extremism, and criminal action have become increasingly blurred. The London Riots, the Occupy movement, and the actions of hacking group Anonymous have all sparked heated debate about the limits of legitimate protest, and the distinction between an acceptable action and a criminal offence. Long before these events, environmental activists were challenging convention in protest actions, with several groups engaging in politically motivated law-breaking. The emergence of the term 'eco-tage' (the sabotage of equipment in order to protect the environment) signifies the important place environmental activists hold in challenging the traditional boundaries between illegal action and legitimate protest.

Many of these groups establish their own boundaries of legitimacy, with some justifying their actions on the basis of civil disobedience or extensional self-defence. This paper examines the statements of environmental activist organisations that have engaged in politically motivated law breaking. It identifies the parameters that these groups set on their illegal actions, as well as the justifications that they provide, with a view to determining where these actions fit in the vast grey area between legal protest and violent extremism.

Introduction

Politically motivated lawbreaking has long been a protest tactic across many movements for social justice. On a continuum between civil disobedience and terrorism exist many forms of action that defy laws, and labels. For instance, terms such as ecotage (the sabotage of equipment in order to protect the environment) have emerged in an effort to define just one form of direct action favoured by radical

environmental and animal rights activists. Many of the actions favoured by these groups exist somewhere in the grey area between legitimate protest and violent extremism. Increasingly, however, environmental protest actions that involve some acts of lawbreaking are being tagged as ecoterrorism, resulting in significant attention from law enforcement, as well as condemnation from the public. This is despite ongoing protest from many activists that their actions, while illegal, are justified within a framework of civil disobedience, and do not amount to terrorism. This 'grey area phenomenon' (Hoffman 1998: 28) poses a significant challenge to both scholars and policy makers in attempts to define terrorist acts, and distinguish between legitimate protest and illegitimate actions. This paper examines the ways in which the lawbreaking actions of environmentalist and animal rights groups are positioned and justified. The first section provides an examination of efforts to categorise politically motivated lawbreaking in order to identify the key factors that establish the borderlines between civil disobedience, terrorism, and acts in between. The second section is an examination of justifications offered by groups for acts of lawbreaking via a content analysis of press releases from five activist groups. These justifications for illegal behaviour offer some insight into how activist groups self-define and categorise their own behaviour on a continuum between legal protest and violent extremism. The data analysed includes press statements put out by Trident Ploughshares, Greenpeace, Sea Shepherd Conservation Society, Stop Huntingdon Animal Cruelty (and associated group Smash HLS), and Rising Tide between January 2010 and December 2012. The analysis involved the coding of each statement to identify recurring themes in the justifications provided for actions. This method is informed, in part, by Liddick's (2013) analysis of individual statements from the Animal Liberation Front. Liddick sought to identify evidence of neutralization strategies employed by activists to assuage feelings of guilt for committing socially deviant acts. This study uses a similar content analysis approach to identify thematic justifications for criminal acts based on traditional justifications for political lawbreaking found in the literature, as well as allowing for the coding to be driven by the data in the identification of new or alternative justifications.

This paper argues that great uncertainty remains over where the lawbreaking activities of radical environmentalists and animal rights activists are positioned on a

spectrum between civil disobedience and terrorism. The justifications offered by activists rely in part on a discourse of civil disobedience, but demonstrate that activists are willing to go beyond passive resistance, or non-violent protest, in a pursuit of immediate change.

Defining Acts of Politically Motivated Lawbreaking

Much of the debate about the definition of terrorism revolves around three key factors: the actor, the target, and the act. Of these categories, the actor appears to be the least determinant factor in justifying a label of terrorism. The State Department of the USA defines terrorism as acts perpetrated by 'sub-national groups or clandestine agents' (US Department of State 1998: vi), however some argue that this definition is too limiting, and does not take account of the terrorist actions of nation-states (Jaggar 2005: 203). The presence of a uniform, or title of power, conveys an element of legitimacy to many acts such as the destruction of infrastructure through targeted bombings, and the killing of civilians in drone strikes that, if perpetrated by a non-state group, would be condemned as terrorism (Jaggar 2005: 204). Others suggest that the focus on the political motivations of actors may unfairly define their actions as terrorism, thus punishing them for having a cause for their crime. Amster argues that, 'It appears to be precisely the political and ethical rationale for the act that turns a garden-variety crime like vandalism into a purported act of ecoterrorism (Amster 2006: 299). This is evident in the definitions of terrorism adopted by a number of nation-states, particularly the United States of America, which has imposed harsher penalties for crimes such as vandalism and arson through 'terrorism enhancements' (Gibson 2010: 142). It is, however, not the actor, but rather the target of the act (human or non-human), and the act itself (violent or non-violent) which most frequently guide the establishment of societal boundaries rendering some acts of political lawbreaking as legitimate and others as condemned.

The target

The targets of terrorist acts are both primary and secondary (Vanderheiden 2005: 428). The primary target is the person, or object, on which the act, or attack, is directly inflicted. The secondary target is considered to be the more important target, the 'real' audience for the attack. It is typically the populace, government or

institution intended to experience 'terror' at the prospect of future actions. There are several ways in which the selection of these primary and secondary targets can serve to distinguish acts of terrorism from other forms of illegal political action for environmental reasons. Firstly, acts of terrorism are broadly considered to be especially evil because they do not discriminate between 'innocent' and 'non-innocent' victims. While the terrorists responsible for the attack on the World Trade Centre in 2001 chose a symbolic target for destruction, they killed thousands of people indiscriminately. By contrast, environmental activists are very discriminating in selecting targets for their actions, choosing individuals and organisations that they believe to be directly responsible for environmental degradation such as SUV dealers, property developers, logging companies, and bio-medical companies utilising animal testing (Liddick 2006: 8).

A second way in which illegal actions by environmentalists may be differentiated from terrorist attacks is in the intended secondary target for their actions. Radical environmentalists tend to favour more direct tactics, with actions taken against the secondary target, or audience, themselves. For example, the Environmental Liberation Front has claimed responsibility for acts directly targeting corporations they believe to be responsible for acts of environmental degradation or animal cruelty. These acts include the burning of buildings and ski lifts at Vail, Colorado and the vandalism of ATMs and bank branches at the Bank of New York in protest of their relationship with animal testing corporation Huntingdon Life Sciences (Liddick 2006: 5).

While these acts may be differentiated from terrorism on the basis that the primary target was the most important target, the impact on a secondary target cannot be discounted altogether. Those responsible for these acts often publicise their activities, which indicates that while the primary aim may be to disrupt environmentally damaging activities such as logging, a secondary aim may be to dissuade other companies from engaging in such activities. This would certainly be true of several of the actions taken by members of animal rights activist group Stop Huntingdon Animal Cruelty (SHAC). Several press releases by the group report on protestors visiting the neighbourhoods of corporate leaders or businesses

associated with Hungtindon Life Sciences, promising more appearances at people's homes and workplaces. One release states:

You'll never know what will be coming next – but we're dying to expose the sick lengths that you're willing to go to in order to make your blood money. The plague is spreading but you have the cure – cut your ties with HLS or your headache has only just begun (SHAC 22 August 2011).

This clearly conveys a threat of future action.

The vast majority of radical environmental or animal rights groups engaging in direct action target corporations as both their primary and secondary targets, rather than governments, which could preclude them from the label of terrorism under some definitions. For instance, the definition of terrorism under US law is an act 'calculated to influence or affect the conduct of government by intimidation or coercion, or to retaliate against government conduct' (*Anti-Terrorism and Effective Death Penalty Act 1996*). Despite this guiding principle that an act should be directed at the state (whether as primary or secondary target), perpetrated by a non-state actor in order to be classified as terrorism, many acts directed at corporate interests have been declared to be eco-terrorism. For example, the burning of buildings and ski lifts at Vail Colorado in 1998 was an act clearly directed against the property developers and resort owners. However, in 2005 when Earth Liberation Front activists were arrested for this crime, then-Attorney General Alberto Gonzalez said, 'Today's indictment proves that we will not tolerate any group that terrorizes the American people, no matter its intentions or objectives' (FBI 1006).

It is not the symbolic institution, but rather the actual object that most dominates and influences debate about what constitutes a terror attack. The mass killing of humans for political ends by non-state actors is widely accepted as a terrorist act, while the destruction of inanimate objects muddies the definitional waters. This ethical boundary is the one most frequently erected by radical environmentalists in setting parameters on their protest activities. Dave Foreman, environmentalist leader, advocates the use of 'monkeywrenching' (typically the sabotage, or eco-tage,

of industrial equipment used in environmentally damaging acts such as bulldozers or timber saws) as a form of 'non-violent resistance to the destruction of natural diversity and wilderness. It is never directed against human beings or other forms of life. It is aimed at inanimate machines and tools that are destroying life' (Foreman and Haywood 1993: 9).

In recent times, however, several nation-states have expanded the definition of terrorist act to include actions against non-human targets. Following the terrorist attacks of September 11 2001, the definition of terrorism was effectively expanded under the Patriot Act to include acts that destroy or attempt to destroy, 'any building, vehicle, or other real or personal property used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce' (*US Patriot Act*). This definition therefore includes almost any action against any for-profit enterprise, effectively removing the requirement that acts be directed against the state as a target. The Animal Enterprise Terrorism Act (AETA) introduced in 2006 further lowered the threshold for an act to be defined as terrorism specifying that acts such as causing 'physical disruption to the functioning of an animal enterprise' would also be considered terroristic, and thus subject to enhancement penalties. Several scholars and activists have argued that these expansions of the definition of terrorism were intended to capitalise on the increased fear of terrorism in a post 9-11 environment, and to suppress dissent from activists for social justice including environmental groups, as well as cyber-activists, or 'hactivists' (Eddy 2005, Best 2007, McCoy 2007, Potter 2008 and Amster 2006).

The act

Definitions of terrorism based on the target of an act are inherently linked to the act itself. Attempts to categorise the illegal actions of environmentalist and animal rights activists on a continuum between civil disobedience and terrorism have centred on these two main variables, largely disregarding the relevance of the actor. Miller, Rivera and Yelin suggest that illegal actions by environmentalist groups can fall within three categories. Firstly, civil disobedience 'would encompass actions of peaceful protest and speech' and would be distinguished from other acts due to the lack of 'significant security threat' posed by the protest. Secondly 'antagonistic

disobedience' is defined as 'actions that are semi-violent or violent' such as 'tree spiking, individual acts of violence or assault, and minor destruction of property and/or resources'. Finally, 'terrorism' would include 'all actions openly violent and destructive to people, property, and/or resources' (Miller, Rivera and Yelin 2008: 118-119).

These proposed categories distinguish between acts of civil disobedience and acts of terrorism primarily on the basis of the use of violence. The middle-ground category of 'antagonistic disobedience', however, creates significant ambiguity in the basis on which distinctions are made. In this casting both 'antagonistic disobedience' and 'terrorism' are violent actions, and both result in harm to people and property. The distinction between the two, therefore, seems to be the scale of the action, with the authors providing examples of terrorism including the Oklahoma City bombing, alongside 'excessive violence against individuals or groups'. The point at which a violent act becomes 'excessive' is implicitly, rather than explicitly defined.

Liddick also offers a way of categorising the actions of environmental activists through distinguishing between different acts. His typologies are:

Type I: Minor crimes involving little or no property damage (less than \$10,000, the limit to invoke federal law) and no threat of human injury.

Type II: Significant acts of property damage, including arson and bombings, whose damages exceed \$10,000, no intended violence against humans but with an indirect threat of physical harm.

Type III: Threatening behaviour directed against people, including minor physical assaults producing no injuries.

Type IV: Physical attacks against persons in which injury actually occurs or is intended (Liddick 2006: 72).

Similar to Miller et al's categories, Liddick's typologies rely on a distinction between targeting humans versus property, and the degree of violence, or scale, of the activities. However, Liddick rejects the idea implicit in Miller et al's categories that targeting humans always causes more harm than targeting property. He argues that,

'Legal statutes, and most persons with an opinion on the topic, would not consider throwing a tofu pie in someone's face (Type III) to be more serious than a multi-million dollar arson (Type II) (Liddick 2006: 72). As such, the Liddick typologies distinguish actions on the basis of both the target and the act, establishing two sub-groups of action. Type I and Type II describe acts against non-human targets, while Type III and Type IV refer to acts against individuals and groups of people. While Type I actions are clearly not terrorism, and Type IV actions clearly are, there is significant debate about the appropriate label for many of the acts falling under the categories of Type II and III.

Justifications for Political Lawbreaking

So far this paper has examined the key variables that influence definitions of terrorism, in order to identify where actions by radical environmental and animal rights activists may fit in the spectrum between civil disobedience and terrorism. In so doing, more questions have been found than answers, indicating that while some acts are easily identified as terrorism (for example, physical violence against humans), other actions are less easily categorised. We now turn to an examination of the ways in which these groups position their own actions, based on the justifications they offer for lawbreaking. An analysis of the statements of five organisations that engage in illegal actions as part of their protest indicated that there are three primary justifications offered for their actions: necessity; a higher moral principle; protection of others or 'extensional self-defence'. It should be noted that the statements analysed are not the guiding principles or mission statements released by these organisations about their overall campaigns or tactics. Rather, they are the press releases about the individual acts, which primarily describe the target of the groups, and the impact the action had (i.e. the success, or achievement). As such, the justifications provided for actions rarely explicitly appeal to traditional justifications for civil disobedience, but provide an important insight into the perceived or implied justification for day to day actions.

Necessity

The first justification frequently offered by organisations for their actions is one of necessity on the basis that all other legal avenues for change have been exhausted.

The exhaustion of all legal avenues also assumes that the activists in question are able to work within the existing power structures to achieve change. Martin Luther King Jr., in his landmark *Letter from Birmingham Jail* justifies the breaking of laws on the basis that 'the city's white power structure left the Negro community with little alternative' (King 1964: 77-99). While the challenge for environmental and animal rights activists is distinctly different to the civil rights movement of the 1960s, Gibson argues that some activists have rejected institutionalised structures for change due to a belief that 'questions of environmental degradation could no longer be separated from critiques of state power, corporate overreach and neoliberal capitalism' (Gibson 2010: 136). This may be compounded by the diminishing traditional avenues through which dissent can be expressed, as a result of the restrictive permit regimes governing mass public protests, and the dominance of corporate interests in government decision-making (White 2009: 56).

Statements by Rising Tide position the organisation as acting on behalf of those ignored or suppressed by those in power. One release states

TransCanada didn't bother to ask the people of this neighbourhood if they wanted to have millions of gallons of poisonous tar sands pumped through their backyards," said Almonte, one of the protestors now inside the pipeline. "This multinational corporation has bullied landowners and expropriated homes to fatten its bottom line (Rising Tide 3 December 2012).

A Rising Tide activist declared in one statement, 'I climbed this tree in honour of all the landowners who have been bullied mercilessly into signing easement contracts and who were then silenced through fear by TransCanada's threat of endless litigation' (Rising Tide 19 November 2012).

Greenpeace also argues that their action is upholding democratic principles, while government structures ignore the wishes of the public. They criticise Brazil's President Dilma, arguing that, 'In failing to completely block new "forest code" legislation yesterday, President Dilma has turned a blind eye to the destruction of the Amazon and a deaf ear to the people of Brazil' (Greenpeace 26 May 2012).

Trident Ploughshares also invokes democratic principles as justification for their trespassing and blockading activities at the nuclear weapons base at Faslane, Scotland. In a release issued on 13 May 2011 activist Janet Fenton is quoted as saying:

Our actions here are not illegal, and are in support of the new Scottish Government. Once again the Scottish people have voted overwhelmingly in opposition to nuclear weapons. This time, there is a clear parliamentary majority for a single party with a manifesto promise to put pressure [on] the UK Government to remove these illegal weapons from Scotland (Trident Ploughshares 13 May 2011).

A justification for illegal action on the basis of necessity is also drawn from a belief not only in the failing of established processes for change, but also in the lack of ability or willingness of those in power to fulfil their roles. For instance, Vanderheiden (2005) poses several case studies of ecotage questioning whether illegal action might be justified on the basis of the failure of governments to enforce laws against illegal logging and development, thus making them complicit with environmental degradation (Vanderheiden 2005: 442-443). Nagtzaam and Lentini (2008) also consider a version of this justification as the basis for actions by the Sea Shepherd Conservation Society, labelling them as 'vigilantes' acting to enforce a law that they believe should be enacted (Nagtzaam and Lentini 2008).

Captain Paul Watson from the Sea Shepherd Conservation Society has said they are acting to prevent 'illegal whaling activities' (SSCS 5 July 2012). Trident Ploughshares also declare that they are acting to prevent illegal action. In many of their press releases they characterise the existence of the Trident nuclear weapons programme as illegal and in breach of the Nuclear Non-Proliferation Treaty. They say, 'As long as the UK government threatens the peace with weapons of mass destruction members of Trident Ploughshares and Faslane Peace Camp are committed to non-violent direct action to disrupt the deployment of these illegal and immoral weapons (Trident Ploughshares 2 July 2012).

A higher moral principle

A second justification offered for illegal acts by organisations is on the basis of morality – the moral justification for action being that to fail to act is immoral. Liddick's recent study of statements by the Animal Liberation Front also found that an 'appeal to a higher moral principle' was frequently invoked to justify illegal actions. Statements from Trident Ploughshares activists regularly reflected this theme. A press release from 2011 declared that 'As long as the government fails to fulfil their responsibilities under international law citizens have right and duty to intervene in order to prevent crimes against humanity and war crimes' (Trident Ploughshares 13 May 2011). Daniel Viesnik, a Trident Ploughshares activist, defended his actions which resulted in a stay in prison saying, 'I feel it is my civic, moral and legal duty to help stop the next generation of nuclear weapons and prevent nuclear crimes against humanity and the planet' (Rising Tide 12 February 2010).

Activists from Rising Tide also explained their lawbreaking activists as an exercise of moral responsibility. Activist Benjamin Franklin said:

As someone who has a religious dedication to nonviolence, I have a duty to assist nonviolent tactics. This is a path to change that works. Despite everything that happened at the direction of TransCanada, I don't regret my involvement at all. I encourage everyone to persevere in the face of this type of sheer brutality. To follow one's moral compass in spite of extreme challenges is the way we move forward towards a more humane, tar sands-free planet (Rising Tide September 2012).

R.C. Saldana-Flores, also from Rising Tide, said, 'As a mother and step-grandmother, I want to be able to tell my children that I did something when the time came' (19 September 2012). One statement from the group Smash HLS (associated with the Stop Huntingdon Animal Cruelty group) made reference to their conscience in explaining their actions. They declared, 'people with a conscience will always be there to speak for the defenceless animals enslaved in places such as Primate Products (October 23 2011). This statement also hints at a further justification

offered by several groups – that their actions are in defence of those who are defenceless.

Protection or 'extensional self-defence'

Environmental leader Steven Best coined the term 'extensional self-defence' to describe the justification for illegal actions such as sabotage and violence. He argued that:

If animals are under violent attack and cannot defend themselves, if the state protects only their oppressors, and if animal rights activists are the only ones who can defend animals, do they not have the right to use sabotage and even violence against exploiters as proxy agents adhering to the principle I call "extensional self-defence" (Best).

Such direct action would seem, on face value, to be contrary to the more traditional aims of civil disobedience. Rawls (1971: 383) argues that the primary aim of civil disobedience is not to effect change in and of itself, but to mobilise mass support as a catalyst for change. Generating public support is certainly one priority of the organisations examined here (especially Greenpeace which engages in many legal protests as well as public theatre designed to bring attention to environmental issues), but this justification for illegal acts serves to circumvent processes of legal change in favour of more immediate change.

The justification for illegal actions on the basis of protection of others, and extensional self-defence of animals, is a frequently used elements in several of the organisations' statements about their actions. None of the statements explicitly invoke a right to extensional self-defence. They do, however, imply this justification through declarations that they are breaking laws in order to protect animals or the environment.

Protection of animal life was a frequent feature of statements from the Sea Shepherd Conservation Society about their anti-whaling activities. For example, Captain Paul Watson said, 'It has been a successful campaign. There are hundreds of whales

swimming free in the Southern Ocean Whale Sanctuary that would now be dead if we had not been down there for the last three months' (8 March 2012). In the same press release Watson declared, 'If the Japanese whalers return, Sea Shepherd will return. We are committed to the defense of the Southern Ocean Whale Sanctuary' (8 March 2012). Greenpeace also declared that some lawbreaking activities by their activists were in an effort to prevent harm to the environment: 'In an effort to prevent destructive oil drilling in the Arctic, dozens of Greenpeace Nordic activists have boarded and occupied a Shell-contracted icebreaker in Helsinki harbour as it prepared to leave for the Alaskan Arctic' (1 May 2012).

Activists from Rising Tide, and Stop Huntingdon Animal Cruelty also spoke of their role as defenders of others. Rising Tide activist Diane Wilson said, 'Me? I'm healthy. They're the ones I'm fighting for. We have to be prepared to fight for those who can't fight for themselves or who are too afraid to fight for themselves. That's why I'm here' (28 November 2012). SHAC declared in many statements that they were acting to prevent the torture and death of animals, with one Smash HLS release declaring, 'It is our right to make our voices heard for all those who suffer inside. Their lives depend on us. This corrupt 'justice' system will not protect them' (26 January 2012). These statements move beyond the idea of passive resistance, and seek to justify organisations taking direct, and illegal, action.

Conclusion

The justifications offered by the environmental rights groups analysed here demonstrate that while there is some adherence to the parameters in which civil disobedience is acceptable, activists are going beyond political performance aimed at garnering public support. This positions them clearly within the grey area of political lawbreaking. This paper has demonstrated that despite efforts to categorise acts of political lawbreaking that exist between civil disobedience and terrorism, little progress has been made. While some activists continue to establish their own ethical parameters in relation to targets, and the act (such as being highly discriminate in selecting targets, and refraining from committing violence against humans), the definition of terrorism has expanded to cover much activity that, while illegal, may not intuitively seem to deserve the label of terrorism. Radical

environmentalists and animal rights activists seek to define themselves out of the category of terrorism by appealing to a tradition of civil disobedience in which illegal actions are sometimes justifiable, but in their own statements clearly stray from the boundaries of civil disobedience by offering justifications for direct action and extensional self-defence.

In moving forward, the challenge is to attempt to understand why the label of terrorism is applied to some actions and not others. Is the actor, act, or target the most important variable? Do the justifications offered by activists mitigate the seriousness of their illegal actions? What are the preconditions for social acceptance of some politically motivated lawbreaking activities and not others? In asking these questions, perhaps the boundaries of terrorism can be re-established, disrupting a binary between legal and illegal protest that is beginning to render nearly all acts of politically motivated lawbreaking as terrorism.

References

Amster R (2006) Perspectives on ecoterrorism: Catalysts, confluences, and casualties. *Contemporary Justice Review* 9(3): 287–301.

Best S (YEAR?) Gaps in Logic, Lapses in Politics: Rights and Abolitionism in Joan Dunayer's Speciesism. <http://drstevebest.org/gapsinlogic.htm> (Accessed 30 April 2013).

Steve B (2007) Dispatches from a police state: Animal rights in the crosshairs of state repression. *International Journal of Inclusive Democracy* 3:1.

Eddy E (2005) Privatising the Patriot Act: The criminalisation of environmental and animal protectionists as terrorists. *Pace Environmental Law Review* 22: 261.

Federal Bureau of Investigation (FBI) (2006) Eco-Terror Indictments – 'Operation Backfire' Nets 11". <http://www.fbi.gov/page2/jan06/elf012006.htm> (Accessed 27 April 2013).

Foreman D and Haywood B (eds.) (1993) *Eco-defense: a Field Guide to Monkeywrenching*. California: Abbzg Press.

Gibson S (2010) State-led social boundary change: transnational environmental activism, 'eco-terrorism' and September 11. in T Olsen (Ed.) *Power and Transnational Activism*. Hoboken: Routledge. PAGE #'s?

Erin O'Brien 31/5/13 3:57 PM

Comment: Somewhat irritatingly there is no year for this. It is an online essay that is undated.

Erin O'Brien 31/5/13 3:58 PM

Comment: Pages 130-150. Not sure what the correct format for including these is. Sorry!

Greenpeace (2012) Greenpeace Stops Pig Iron Shipment From Leaving Brazil Port. *Greenpeace*. 26 May. www.greenpeace.org/international/en/press/releases/Pig-iron-shipment-blocked/

Greenpeace (2012) Greenpeace blocks Arctic destruction Activists occupy Shell icebreaker in Finland." *Greenpeace*. 1 May. www.greenpeace.org/international/en/press/releases/Greenpeace-blocks-Arctic-destruction-Activists-occupy-Shell-icebreaker-in-Finland/

Jaggar A (2005) What Is terrorism, why is it wrong, and could it ever be morally permissible? *Journal of Social Philosophy* 36(2): 202–217.

King Jr M (1964) *Why We Can't Wait*. New York: Harper and Row.

Liddick D (2006) *Eco-Terrorism: Radical Environmental and Animal Liberation Movements*. Westport: Praeger Publishers.

Liddick D (2013) Techniques of neutralisation and animal rights activists. *Deviant Behavior* 34(8): 618–634.

McCoy K (2007) Subverting justice: An indictment of the animal enterprise terrorism act. *Animal Law* 14: 53.

Miller D, Rivera J and Yelin J (2008) Civil liberties: The line dividing environmental protest and ecoterrorists. *Journal for the Study of Radicalism* 2(1): 109–123.

Nagtzaam G, and Lentini P (2007) Vigilantes on the high seas?: The Sea Shepherds and political violence." *Terrorism and Political Violence* 20(1): 110–133.

Potter W (2008) The green scare. *Vermont Law Review* 33: 671.

Rawls J (1971) *A Theory of Justice*. Cambridge, Massachusetts: Belknap.

Rising Tide (2012) Two people barricade themselves inside Keystone XL pipe to halt construction. *Rising Tide*. 3 December. www.risingtidenorthamerica.org/2012/two-people-barricade-themselves-inside-keystone-xl-pipe-to-halt-construction/

Rising Tide (2012) Tar sands blockaders lock themselves to trucks outside Valero's Houston refinery. *Rising Tide*. 28 November. www.risingtidenorthamerica.org/2012/11/tar-sands-blockaders-lock-themselves-to-trucks-outside-valeros-houston-refinery/

Rising Tide (2012) Forty blockaders walk onto TransCanada worksite near Nacogdoches, launch ground and aerial blockades. *Rising Tide*. 19 November. www.risingtidenorthamerica.org/2012/11/forty-blockaders-walk-onto-transcanada-worksite-near-nacogdoches-launch-ground-aerial-blockades/

Rising Tide (2012) Tar sands blockade: TransCanada actively encouraged torture tactics to be used on peaceful protestors. *Rising Tide*. September. www.risingtidenorthamerica.org/2012/09/tar-sands-blockade-transcanada-actively-encouraged-torture-tactics-to-be-used-on-peaceful-protestors/

Rising Tide (2012) More action in Texas as three blockaders lock themselves to Keystone XL machinery." *Rising Tide*. 19 September. www.risingtidenorthamerica.org/2012/09/more-action-in-texas-as-three-blockaders-lock-themselves-to-keystone-xl-machinery/

Sea Shepherd Conservation Society (SSCS) (2012) Japanese whalers acknowledge Sea Shepherd success." *SSCS*. 5 July. www.seashepherd.org/news-and-media/2012/07/05/japanese-whalers-acknowledge-sea-shepherd-success-1402

Sea Shepherd Conservation Society (SSCS) (2012) The whalers head home!" *SSCS*. 3 March. www.seashepherd.org/news-and-media/2012/03/08/the-whalers-head-home-1352

Smash HLS (2011) 5th home demo at Kathy Turner's. *SmashHLS*. 23 October. <http://smashhls.com/2011/10/23/5th-home-demo-at-kathy-turners-2/>

Smash HLS (2012) Protest at Renate Lemke's house and primate products. *SmashHLS*. 26 January. <http://smashhls.com/2012/01/26/protest-at-renate-lemkes-house-and-primate-products/>

Stop Huntingdon Animal Cruelty (SHAC) (2011) Injuries and deaths at Astrazeneca's London shareholders". *SHAC*. 22 August. www.shac.net/news/2011/september/18.html

Trident Ploughshares (2010) Nuclear bomb opponents gear up for direct action as new warhead facility gets green light. *Trident Ploughshares*. 12 February. www.tridentploughshares.org/article1592

Trident Ploughshares (2011) Trident Ploughshares and Faslane peace camp blockade Trident base. *Trident Ploughshares*. 13 May. www.tridentploughshares.org/article1629

Trident Ploughshares (2012) Seven people enter Faslane main gate. *Trident Ploughshares*. 2 July. www.tridentploughshares.org/article1696

US Department of State (1998) *Patterns of Global Terrorism 1997*, Department of State Publications, 10321. Washington DC: United States Department of State.

Vanderheiden S (2005) Eco-terrorism or justified resistance? Radical environmentalism and the 'War on Terror'." *Politics & Society* 33 (3) (September 1): 425-447.

Vanderheiden S (2008) Radical environmentalism in an age of antiterrorism. *Environmental Politics* 17 (2): 299-318.

White R (2009) Environmental victims and resistance to state crime through transnational activism. *Social Justice* 36 (3): 46-60.